



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

99-RU-0167

Mr. M. J. Bullock, Vice President
TWRS General Manager
BNFL Inc.
Richland, Washington 99352

Dear Mr. Bullock:

RESPONSE TO EMPLOYEE CONCERNS PROGRAM (ECP) INSPECTION REPORT

- Reference:
1. BNFL Letter 001348, January 29, 1999, TWRS-P Contract No. DE-AC06-96RL13308 – W375 – Response to Employee Concerns Program Inspection Report
 2. DOE Letter 99-RU-0103, December 30, 1998, Employee Concerns Program (ECP) Inspection Report, IR-98-001

The Office of Radiological, Nuclear, and Process Safety Regulation of the TWRS-P Contractor (Regulatory Unit) has reviewed the BNFL Inc. response (Reference 1) to the ECP Inspection Report, IR-98-001 (Reference 2). The information requested in Reference 2 was provided in Reference 1. The Regulatory Unit (RU) has determined that the response is acceptable and that the corrective action commitments, if properly implemented, should be sufficient to address the finding (IR-98-001-01-FIN). The RU has no additional requests for information on this matter at this time.

In accordance with RU Management Directive 2.3, "Commitment Management System," the RU will track the following BNFL Inc. corrective action commitments that were described in Reference 1 per the enclosed "Table 1 – BNFL Inc. Employee Concerns Program Corrective Action Commitments."

The RU will verify your corrective actions during future inspection activities. Once the corrective actions have been verified, the RU will close Inspection Finding IR-98-001-01-FIN.

M. J. Bullock
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Nothing in this letter should be construed as changing the Contract (DE-AC06-96RL13308). If you have any questions on the tracking of these items, inspection follow-up, or any other questions regarding this inspection, please contact Pat Carier of my staff on (509) 376-3574.

Sincerely,

D. Clark Gibbs, Regulatory Official
Office of Radiological, Nuclear and
Process Safety Regulation

RNP:NKH

Enclosure:
ECP Corrective Action Commitments

cc w/encl: D. W. Edwards, BNFL

Table 1 – BNFL Inc. Employee Concerns Program Corrective Action Commitments

Commitment Number	Commitment Description	Expected Completion Date	Requires Incorporation in the authorization basis? ¹	Authorization basis document affected
99-CMS-006	ECP training will be mandatory for all BNFL TWRS-P project positions.	01/29/99	Yes	ECP Description
99-CMS-005	Training on the ECP will be conducted for all current BNFL employees.	04/02/99 (Note: This date was confirmed by telecon from M. Eades to N. Hunemuller on 02/09/99.)	No	
99-CMS-004	ECP Information has been added to the Project Orientation package.	01/29/99	No	
99-CMS-007	Qualification standards for the ECP officer, coordinator, and staff will be incorporated in BNFL TWRS-P project documents.	04/02/99	Yes	ECP Description
99-CMS-008	Develop procedural guidance for handling employee concerns and incorporate in BNFL TWRS-P implementing project documents.	04/02/99	No	
99-CMS-009	Develop procedural guidance for ECP administration and incorporate in BNFL TWRS-P project documents.	04/02/99	No	
99-CMS-010	Senior BNFL project management will encourage and endorse the ECP during ECP training.	01/29/99	Yes	ECP Description

¹ “Yes,” in the column “Requires Incorporation in the authorization basis,” means that the RU expects that the corrective action commitment will be reflected in a revision to the indicated authorization basis document.